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**5 Attorneys for Defendant  
Unum Life Insurance Company of America**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA**

11 EDWARD L. SCHECHTER,  
12 Plaintiff,  
13 vs.  
14 UNUM LIFE INSURANCE  
COMPANY OF AMERICA and Does  
15 1-10,  
16 Defendants.

Case No.: 08 CV 459 WQH LSP  
[Hon. William Q. Hayes]  
**JOINT MOTION AND STIPULATION  
TO EXTEND TIME FOR RESPONSE  
TO COMPLAINT AND [PROPOSED]  
ORDER THEREON**  
[Local Rules 7.2 and 12.1]  
Disc. C/O: Not Set  
Motion C/O: Not Set  
Trial Date: Not Set

## STIPULATION

WHEREAS, Plaintiff Edward L. Schechter (“Plaintiff”) filed his Complaint in the above-entitled Court on March 12, 2008;

WHEREAS, on March 20, 2008, Defendant Unum Life Insurance Company of America (“Unum Life”) was served with the Complaint in this action;

WHEREAS, Unum Life's response to the Complaint is currently due on April 9, 2008;

WHEREAS, on April 7, 2008, Plaintiff's granted Unum Life's request for a 14-day extension to file and serve its response to the Complaint, subject to Court approval;

WHEREAS, Unum Life contends good cause exists for the requested the 14-day extension of time in which to file a response because its counsel needs additional time to review the files relating to this matter, to evaluate Plaintiff's claims and allegations and to prepare a meaningful response to the Complaint.

NOW THEREFORE, SUBJECT TO COURT APPROVAL, IT IS HEREBY  
STIPULATED BY AND BETWEEN THE PARTIES THROUGH THEIR  
UNDERSIGNED ATTORNEYS OF RECORD, that UNUM LIFE shall have a 14-  
day extension of time in which to respond to the Complaint — *i.e.*, up to and  
including April 23, 2008.

1 IT IS SO STIPULATED.

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3 Dated: April 7 2008

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Dated: April \_\_, 2008

LEVINE, STEINBERG, MILLER &  
HUVER

By:

  
HARRIS I. STEINBERG

Attorneys for Plaintiff

Edward L. Schechter

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BARGER & WOLEN LLP

By:

  
SANDRA L. WEISHART

Attorneys for Defendant

Unum Life Insurance Company

1 IT IS SO STIPULATED.  
2

3 Dated: April \_\_, 2008

LEVINE, STEINBERG, MILLER &  
4 HUVER

5  
6 By: HARRIS I. STEINBERG  
7 Attorneys for Plaintiff  
Edward L. Schechter

8  
9 Dated: April 8, 2008

10 BARGER & WOLEN LLP

11 By: Sandra I. Weishart  
12 SANDRA I. WEISHART  
13 Attorneys for Defendant  
Unum Life Insurance Company

## **PROOF OF SERVICE**

***Edward L. Schechter v. Unum Life Insurance Company of America  
USDC NO. 08 CV 459 WQJ LSP)***

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: Barger & Wolen LLP, 515 South Flower Street, 34<sup>th</sup> Floor, Los Angeles, California 90071.

On April 8, 2008, I served the foregoing document(s) described as JOINT MOTION AND STIPULATION TO EXTEND TIME FOR RESPONSE TO COMPLAINT AND [PROPOSED] ORDER on the interested parties in this action by placing [ ] the original [X] a true copy thereof enclosed in sealed envelope addressed as stated in the mailing list below.

Harris I. Steinberg, Esq.  
Levine, Steinberg, Miller & Huver  
550 West C. Street, Suite 1810  
San Diego, CA 92101

[X] BY MAIL

[X] I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

**(FEDERAL)** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.  
Executed at Los Angeles, California on April 8, 2008.

Sonia Martinez  
(Name)

S. M. Ad  
(Signature)